
Exhibit E-1 of Original Application
Environmental Statement

Three (3) of the six (6) proposed sites in La Star's instant amendment may require further environmental processing in accordance with Section 1.1307 of the FCC Rules. Sites 1, 3, and 4 are located in floodplain areas. Accordingly, brief environmental assessment information specified by Section 1.1311 of the FCC Rules is provided herein for each of these three sites. Construction of the other three sites proposed herein (2, 5, & 6) would not result in a major environmental action as defined by Sections 1.1305 and 1.1307 of the FCC Rules.

Cell #1, Salt Bayou

Cell #1 is located on the western side of Hwy 433 approximately 4 miles south of the interchange with Interstate Hwy. I-10. The property is located next to a drainage canal, 2500 ft. inland from the shore of Lake Ponchartrain. This site was selected to provide link up or hand-off capabilities with the adjacent CGSA in metropolitan New Orleans which would maintain a continuity of service for both Interstate I-10 and Hwy. 90 leading into Bay St. Louis, Gulfport, and Biloxi, MS. All of the land from which to select a site that will serve this purpose is in a flood plain. Exhibit E-1-A, attached herewith, is a copy of the pertinent portion of the "Flood Insurance Rate Map" issued by the National Flood Insurance Program. This map indicates that the proposed site is in an area evaluated as Zone V15 (EL16). The Zone V15(EL16) falls into the category "Areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined." La Star is proposing to erect a 159' self supporting tower to support a cellular radiotelephone base station. Cellular facilities are capable of operating without continual maintenance and on site

monitoring. Erection of a self supporting tower for the light equipment necessary to cellular base station transmit and receive antennas has a minimal impact on the surrounding environment. No major resurfacing, deforestation, water diversion, wetland fill, or other extensive changes are contemplated here by La Star in order to commence cellular operations at this site. Base on conversations between engineering representatives of La Star and the St. Tammany Parish Development and Planning Office, La Star believes that this site is currently zoned SA or "Suburban Agricultural". While erecting a tower at this site will require issuance of a "conditional use" permit by a vote of the St. Tammany Parish Development and Planning Commission, La Star is confident that it will be able to proceed. The selection of this site was guided by local realty agents who have demonstrated competence in the understanding of local zoning procedure. La Star is not aware of any local environmental controversy over the construction of a cellular tower at this site.

Cell #3, Lacombe

Cell #3 is located approximately 2 miles south of the town of Lacombe, LA and 1.8 miles east of the closest point on the Lake Ponchartrain shore. This site was selected to provide service to Interstate I-12 traffic between Slidell, LA and Covington, LA while still providing service to the other main thoroughfares between communities such as Slidell, Lacombe, and Mandeville, LA. Almost all of the land in the area of Lacombe is flat, marshy, bayou country classified as a flood plain. Any site chosen to provide coverage to the northern lake shore residents that will still serve I-12 in the vicinity of Lacombe will be faced with the problem of locating in a floodplain. Exhibit E-1-C, attached herewith, is a copy of the pertinent portion of the "Flood Insurance Rate Map" issued by the National Flood Insurance Program. This map indicates that the proposed site is in an area evaluated as Zone A10(EL12). The Zone

A10(EL16) falls into the category of "Areas of 100-year flood; base flood elevations and flood hazard factors determined." La Star is proposing to erect a 165' guyed tower to support a cellular radiotelephone base station. Cellular facilities are capable of operating without continual maintenance and on site monitoring. Erection of a guyed tower for the light equipment necessary to cellular base station transmit and receive antennas has a minimal impact on the surrounding environment. No major resurfacing, deforestation, water diversion, wetland fill, or other extensive changes are contemplated here by La Star in order to commence cellular operations at this site. Based on conversations between engineering representatives of La Star and the St. Tammany Parish Development and Planning Office, La Star believes that this site is currently zoned SA (Suburban Agricultural). While erecting a tower at this site will require issuance of a conditional use permit by a vote of the St. Tammany Parish Development and Planning Commission, La Star is confident that it will be able to proceed. The selection of this site was guided by local realty agents who have demonstrated competence in the understanding of local zoning procedure. La Star is not aware of any local environmental controversy over the construction of a cellular tower at this site.

Cell #4, Abita Springs

Cell #4 is located five miles east of Abita Springs in the heart of St. Tammany Parish. The area abounds with small creeks feeding into the Pearl River nine miles to the east. This site was selected to provide service to a large portion of the parish. It is capable of providing service for subscribers from Covington towards the major northern community of Bogaloosa while also providing service for Interstate I-12, Hwys 21, 36, and 41. These are all vital major thoroughfares in this region. This land is suited to La Star's needs due to its availability and location between the communities of Covington, Bogaloosa, Pearl River, Slidell, and Mandeville. Without

service in this part of St. Tammany, a critical gap in continuous service would evidence the need for coverage. Exhibit E-1-D, attached herewith, is a copy of the pertinent portion of the "Flood Insurance Rate Map" issued by the National Flood Insurance Program. This map indicates that the proposed site is in an area evaluated as Zone A surrounding Abita Creek. Zone A is described as "Areas of 100-year flood; base flood elevations and flood hazard factors not determined." La Star is proposing to erect a 214' guyed tower to support a celular radiotelephone base station. Cellular facilities are capable of operating without continual maintenance and on site monitoring. Erection of a guyed tower for the light equipment necessary to cellular base station transmit and receive antennas has a minimal impact on the surrounding environment. No major resurfacing, deforestation, water diversion, wetland fill, or other extensive changes are contemplated here by La Star in order to commence cellular operations at this site. Based on conversations between engineering representatives of La Star and the St. Tammany Parish Development and Planning Office, La Star believes that this site is currently zone as Rural. While erecting a tower at this site will require issuance of a "conditional use" permit by a vote of the St. Tammany Parish Development and Planning Commission, La Star is confident that it will be able to proceed. The selection of this site was guided by local realty agents who have demonstrated competence in the understanding of local zoning procedure. La Star is not aware of any local environmental controversy over the construction of a cellular tower at this site.

<u>Exhibit E-2 of Original Application</u>
<u>Cellular Geographic Service Area</u>

La Star had originally proposed to cover all significant population centers in the New Orleans Metropolitan Statistical Area (MSA) which are outside of the N.O.CGSA CGSA. The La Star CGSA encompasses the entire population of the St. Tammany Parish

(110,869) and provides link up or hand-off capabilities with the adjacent New Orleans metropolitan CGSA. The small changes in site locations do not effect La Star's proposed coverage of the CGSA. The following table illustrates the originally estimated coverage statistics and the estimated coverage statistics based on the instant engineering amendment. Area estimates for the instant amendment were determined with a compensating polar planimeter. MSA area data has been excluded due to the intricate nature of the New Orleans coastline.

39 dBu Area (Originally Proposed) - - - - - - - - 1,066 $mi^2$
39 dBu Area (As Amended) - - - - - - - - - - - - - 1,048 $mi^2$
Total CGSA Area (Originally Proposed) - - - - - 1,196 $mi^2$
Total CGSA Area (As Amended - No Change)- - - - 1,196 $mi^2$
CGSA Coverage (Originally Proposed) - - - - - - - - 89.1%
CGSA Coverage (As Amended)- - - - - - - - - - - - - 87.6%
Population within CGSA (Originally Proposed)- 110,869
Population within CGSA (As Amended) - - - - - 110,869

La Star in not proposing to increase any of the extensions proposed in the original application. The de minimis extensions, as tabulated below, have either remained the same or they have been reduced due to the small changes in site location. Extension area for the instant amendment was determined with a compensating polar planimeter. MSA area data has been excluded due to the intricate nature of the New Orleans coastline.

Extension data from Original Proposal

| Cell No. | Extension Area ($mi^2$) | Entire Cell ($mi^2$) | Extension as % of Cell | Extension as % of CGSA |
|---|---|---|---|---|
| 1 | 0.8 | 243.8 | 0.3% | 0.07% |
| 2 | 34.8 | 243.9 | 14.3% | 2.9% |
| 5 | 12.7 | 165.4 | 7.7% | 1.1% |
| 6 | 35.1 | 216.8 | 16.2% | 2.9% |


Extension data for Instant Amendment

| Cell No. | Extension Area ($mi^2$) | Entire Cell ($mi^2$) | Extension as % of Cell | Extension as % of CGSA |
|---|---|---|---|---|
| 1 (eliminated when coverage was predicted for the instant amendment) | | | | |
| 2 | 28.4 | 227.6 | 12.5% | 2.4% |
| 5 | 4.0 | 148.5 | 2.7% | 0.3% |
| 6 | 28.0 | 202.3 | 13.8% | 2.3% |

The de minimis extensions for Cells 5 and 6 are entirely into the non MSA parish of Tangipahoa. They are the necessary result of providing a minimal level of service to subscribers in St. Tammany Parish along the major thoroughfares.

The de minimis extension from Cell #2 extends into Pearl River and Hancock Counties in the Biloxi - Gulfport secondary MSA. This extension is vital to providing continuous service to subscribers along Interstates I-10, I-59, and State Hwy 11. Cell 2 will also provide handoff and link up capabilities with the adjacent Biloxi - Gulfport, MS MSA. U.S. Cellular, the minority partner for the instant La Star application is also the minority partner in POTSI. POTSI (formerly Mississippi Cellular, Inc.) is the wireline licensee for the Biloxi - Gulfport, MS cellular system. U.S. Cellular has indicated that the de minimis extension of La Star's Cell #2 will ultimately provide a degree of mutual benefit for the two systems by providing a continuity of service and an increased system efficiency for cellular users in the area.

To illustrate the nature of the changes proposed herein, two CGSA maps have been prepared. Map Figure 1 is a full scale (1:250,000) copy of the CGSA and proposed 39 dBu coverage as described by the instant Engineering Amendment. Map Figure 2 is a full scale (1:250,000) copy of the CGSA as originally proposed by La Star, along with the new sites and predicted coverage. Map Figure 2


provides an illustration of the small magnitude of the changes proposed herein. Both Maps clearly indicate the sites, scale of distance in miles and kilometers, and reference points for latitude and longitude. Reduced, $8^1/_2$" x 11", copies of Map Figures 1 & 2 have also been provided herewith.

The results of the engineering calculations for each base station are set forth in Table(s) MOB-3 on the accompanying FCC Forms 401.

The distances to the 39 dBu contour for each cell along twenty - four (24) radials, beginning at true North and spaced 15 degrees apart, were calculated in accordance with the requirements of Sections 22.903(c) and 22.115 of the FCC Rules. The procedures followed in those calculations were consistent with Section 22.504 of the FCC Rules and FCC Report No. R-6406, "Technical Factors Affecting Assignment of Facilities in the Domestic Public Land Mobile Radio Service" by Roger B. Carey.

A computer algorithm was designed to reflect accurately the "Carey Curves" shown in Section 22.504(c), Figure 3, 450-460 MHz Field Strength F(50,50). The algorithm is structured such that antenna heights above average terrain that are less than 100 feet use the 100 foot value as a default height.

The terrain data used in the calculations of the distance to the 39 dBu contours were extracted from a computer-based map of the United States. In accordance with Para. 22.116(c)(2) of the FCC Rules, and as clarified in a Public Notice dated February 16, 1984 ("Use of Computer-Generated Terrain data in Public Mobile Service Applications Under Revised Part 22 (CC Docket 80-57)"), the computer-based map is the Thirty Second (30") Point Source Terrain Data file from the United States Department of Commerce, National Oceanic and Atmospheric Administration, Environmental Data and

Information Service, National Geophysical and Solar-Terrestrial Data Center, Boulder, Colorado.

Exhibit E-5 of Original Application
Control Point and Alarm Systems

In its original application, La Star proposed to locate the control point at Cell #2 on Dummyline Rd. The control point for La Star's proposed system will now be located at the amended Cell #2 on Dummyline Rd.

Exhibit E-6 of Original Application
Frequency Plan

The originally proposed frequency plan has been attached as Appendix A. In spite of the length of time between filing the original application and this amendment, La Star is specifying the same frequencies herein that were specified in the original application. Due to the ever changing state of frequency plans and the introduction of more cellular systems to the immediate region, La Star will assess the wireline frequency usage immediately prior to commencing operation and coordinate its frequency plan with all pertinent wireline operators. With the number of assignable frequencies available, it will be possible to avoid any intersystem frequency interference or restricted ultimate system capacity.

Exhibit E-6-A of La Star's original application was a tabulation of distances to the three N.O.CGSA cell sites in Metropolitan New Orleans from La Star's six cell sites. That exhibit is shown in tabular form below to reflect the distance to the N.O.CGSA sites from La Star's amended sites.

| | N.O. CGSA Sites | J Metairie | K New Orleans | K,ZZ Villemar Pl. |
|---|---|---|---|---|
| La Star Sites | | | | |
| 1(Original) | - - - - | 29.2 mi | - - - 18.0 mi | - - - - 25.7 mi |
| 1(Amended) | | 29.2 mi | 18.0 mi | 25.7 mi |
| 2(Original) | - - - - | 37.1 mi | - - - 29.1 mi | - - - - 37.0 mi |
| 2(Amended) | | 37.1 mi | 29.1 mi | 36.9 mi |
| 3(Original) | - - - - | 24.4 mi | - - - 19.1 mi | - - - - 26.3 mi |
| 3(Amended) | | 24.3 mi | 19.0 mi | 26.2 mi |
| 4(Original) | - - - - | 36.7 mi | - - - 33.1 mi | - - - - 40.1 mi |
| 4(Amended) | | 37.4 mi | 33.6 mi | 40.6 mi |
| 5(Original) | - - - - | 31.0 mi | - - - 32.3 mi | - - - - 37.5 mi |
| 5(Amended) | | 29.6 mi | 30.6 mi | 35.9 mi |
| 6(Original) | - - - - | 40.6 mi | - - - 41.6 mi | - - - - 47.1 mi |
| 6(Amended) | | 40.7 mi | 41.7 mi | 47.2 mi |

At this time there are four (4) cellular markets with which La Star must coordinate. There is either an existing Radio Station Authorization or a pending application for the wireline frequency block for each of the following markets within seventy - five (75) miles of La Star's proposed sites: Metropolitan New Orleans, LA (N.O. CGSA, Inc.); Baton Rouge, LA, Biloxi - Gulfport, MS; and Pascagoula, MS.

Aeronautical Considerations

Because of the small changes in site locations described by the instant amendment, La Star has notified the Southwestern Regional Office of the FAA in Fort Worth, Texas. Copies of the new FAA Forms 7460-1 are attached herewith as Appendix B.

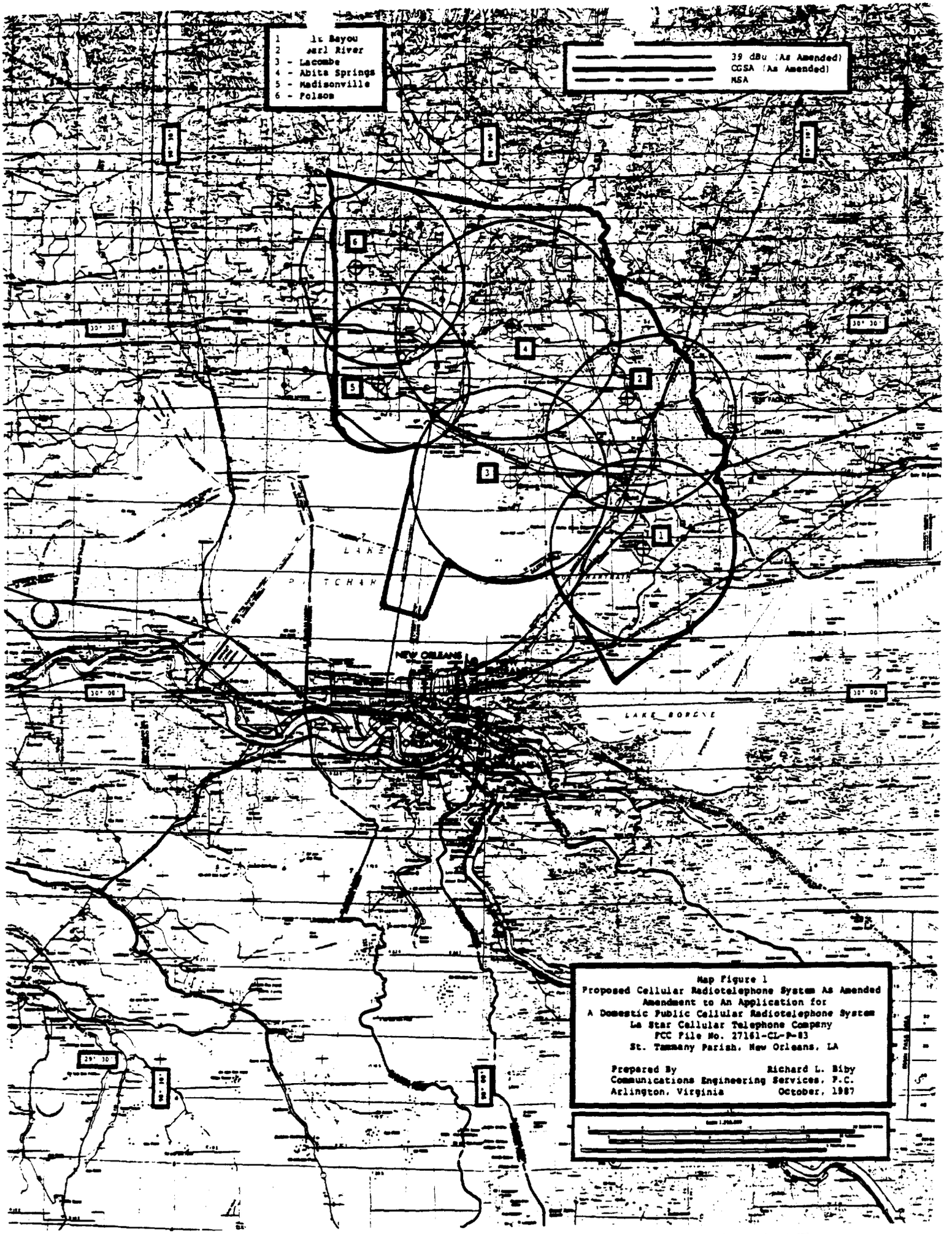

Summary

By the instant amendment to its engineering data, La Star is providing updated site locations and FCC Forms 401 Schedules B to report the exact locations and the small nature of the changes in coverage. These changes in location were due to the prolonged period of time between the original application in September, 1983 and La Star's reinstatement per the Public Notice of September, 1987. No significant changes in the design of the original application have been introduced.

Certification

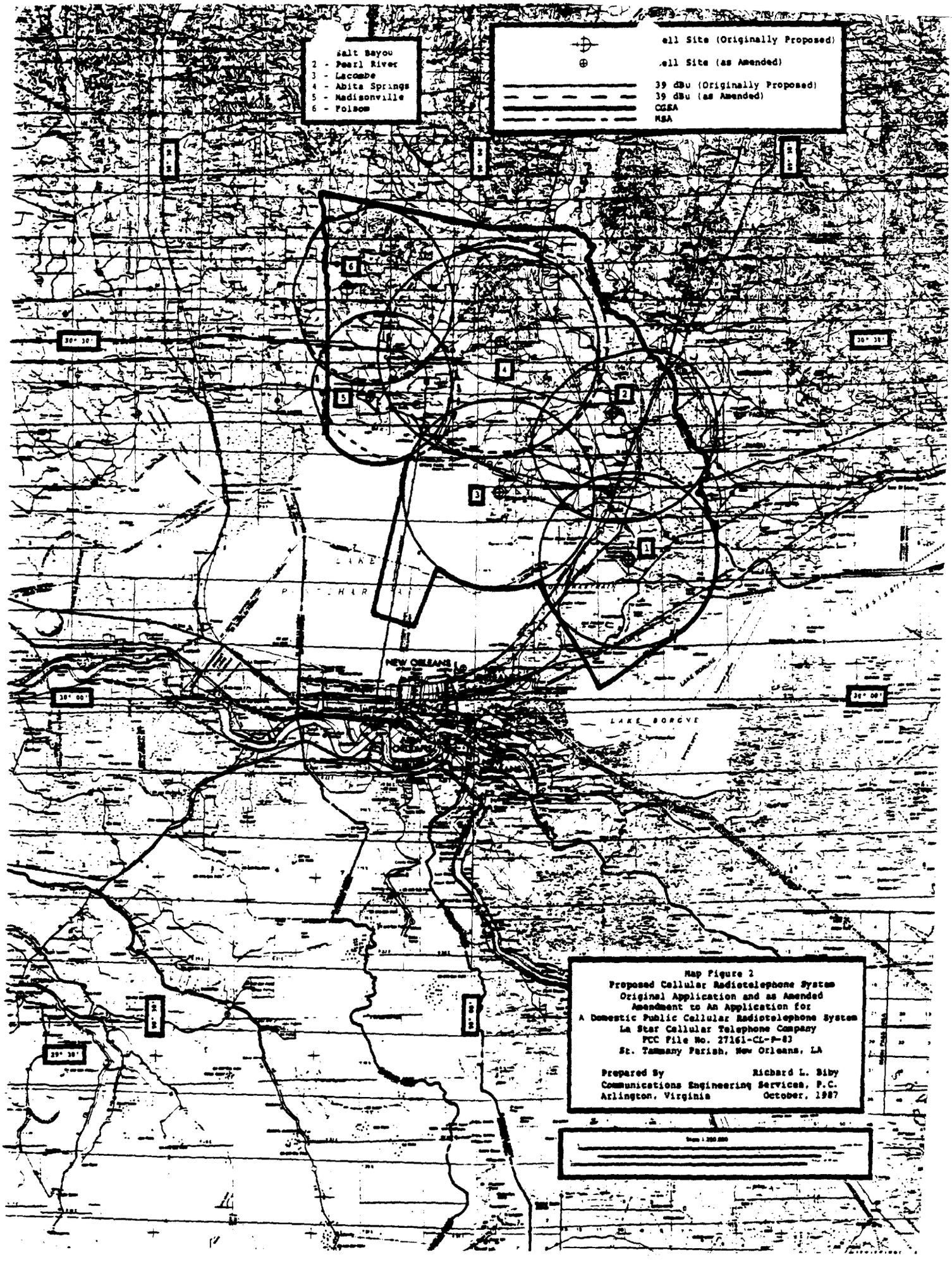
Under penalty of perjury, I state that the foregoing is true and correct to the best of my knowledge and belief.

Richard L. Biby
Registered Professional Engineer
District of Columbia Reg. No. 5710E
Commonwealth of Virginia Reg. No. 014018




Map Figure 1
Proposed Cellular Radiotelephone System As Amended
Amendment to An Application for
A Domestic Public Cellular Radiotelephone System
La Star Cellular Telephone Company
FCC File No. 27161-CL-P-83
St. Tammany Parish, New Orleans, LA

Prepared By Richard L. Biby
Communications Engineering Services, P.C.
Arlington, Virginia October, 1987




Map Figure 2
Proposed Cellular Radiotelephone System
Original Application and as Amended
Amendment to An Application for
A Domestic Public Cellular Radiotelephone System
La Star Cellular Telephone Company
FCC File No. 27161-CL-P-83
St. Tammany Parish, New Orleans, LA

Prepared By Richard L. Biby
Communications Engineering Services, P.C.
Arlington, Virginia October, 1987

LA STAR CELLULAR TELEPHONE COMPANY
Domestic Public Cellular Radio Telecommunications Service
Interim Cellular System, New Orleans, Louisiana

Response to Section 22.913(a)(2) of the Commission's Rules: Cellular Geographic Service Area

With the associated engineering exhibits, the attached FCC Forms 401 Schedules B, and CGSA map, La Star Cellular Telephone Company ("La Star") is submitting an application for interim operating authority for a Domestic Public Cellular Radiotelephone System with three (3) cell sites to serve St. Tammany Parish, LA. The instant interim application is submitted to replace New Orleans CGSA, Inc. as the operator in the St. Tammany Parish, LA portion of the New Orleans MSA.

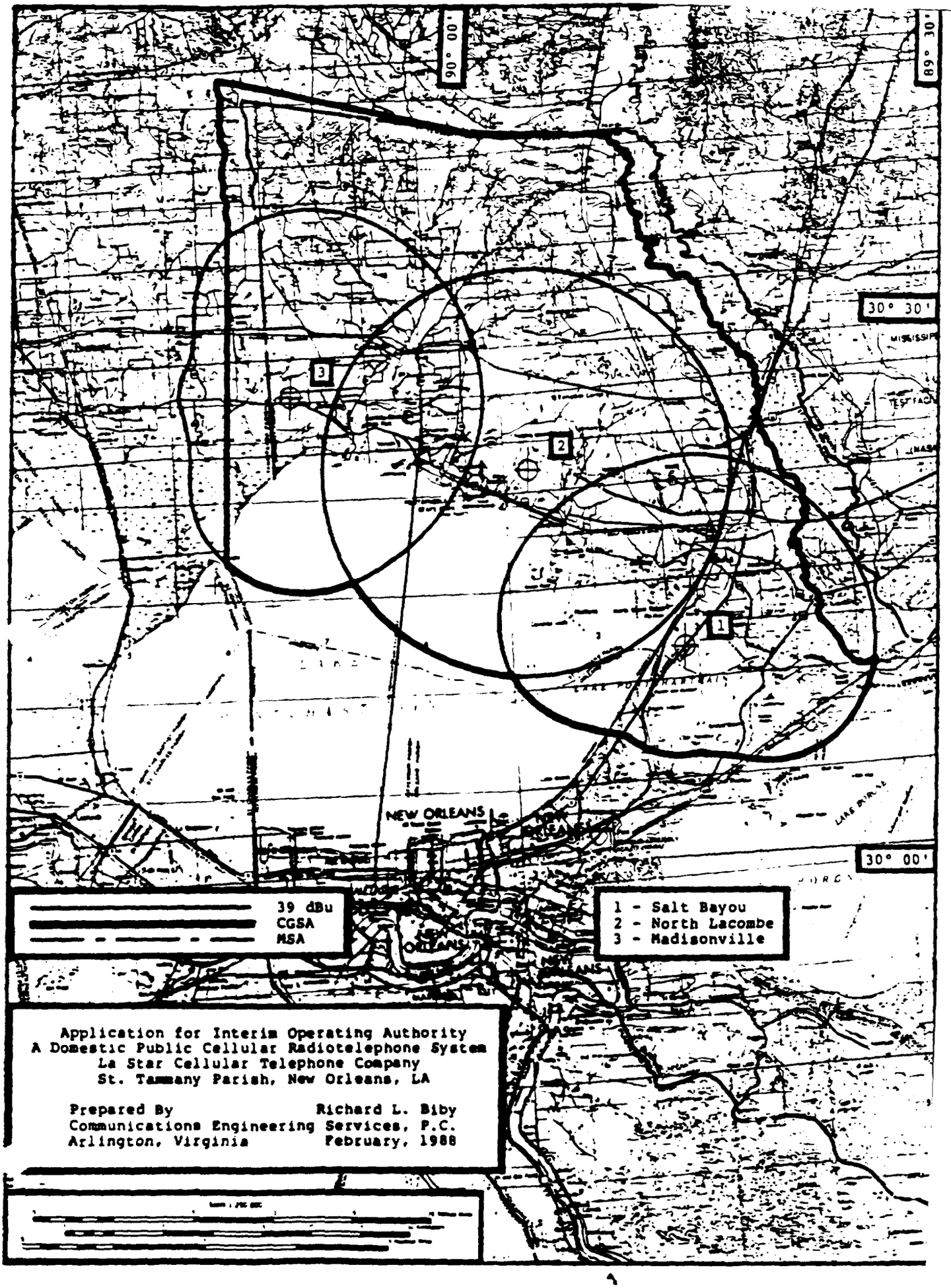
The CGSA map, per the Commission's requirements under §§22.2 and 22.903(a), was prepared on full scale 1:250,000 U.S.G.S. topographic quadrangle series maps covering St. Tammany Parish, LA. Depicted on the CGSA map are the base station sites, the associated 39 dBu signal strength contours, and the interim Cellular Geographic Service Area (CGSA). Also depicted on the instant CGSA map are a scale of miles and kilometers and latitude and longitude markings.

La Star is proposing to include more than 75% of its interim CGSA within its composite 39 dBu service contours. Using a compensating polar planimeter, La Star estimates that its composite 39 dBu contours cover 895 $mi^2$ or 78.2% of its 1,145 $mi^2$ interim CGSA. The CGSA map illustrates that the entirety of St. Tammany Parish will be encompassed by the proposed CGSA. According to to 1980 U.S. Census, 110,869 people (100%) will reside within La Star's CGSA.

The computed 39 dBu contour for Cell 1 extends very slightly into Hancock County, MS in the adjacent secondary MSA of Biloxi Gulfport, MS. The estimated extension area is 27 $mi^2$ or 3.0% of the 39 dBu area within St. Tammany Parish. Using the MARF II 1980 U.S. Census data base, which provides census tract and sub-tract population data for each Minor Civil Division with clearly defined geographic reference coordinates, La Star estimates that there are 660 people residing in Hancock County, MS within this de minimis extension area.


The computed 39 dBu contour for Cell 3 extends very slightly into the neighboring Non MSA area of Tangipohoa Parish, LA. The estimated extension area is 42 $mi^2$ or 4.7% of the 39 dBu area within St. Tammany Parish. Using the same MARF II census file described above, La Star estimates that there is no population within the de minimis extension into Tangipohoa Parish, LA.

These de minimis extensions are imperative in order to provide a threshold level of service to the subscribers within St. Tammany Parish along the Interstate I-12 thoroughfare. It is also essential to provide complete handoff and link capabilities with the adjacent wireline cellular operation in Biloxi-Gulfport-Pascagoula, MS (POTSI). The instantly proposed handoff and link capability will ultimately provide a degree of mutual benefit to both the La Star and the POTSI systems by providing a continuity of service and an increased communications efficiency for cellular users in the area.




Application for Interim Operating Authority
A Domestic Public Cellular Radiotelephone System
La Star Cellular Telephone Company
St. Tammany Parish, New Orleans, LA

Prepared By Richard L. Biby
Communications Engineering Services, P.C.
Arlington, Virginia February, 1988

## CERTIFICATE OF SERVICE

I, R. Loren Bradon, secretary in the law offices of Lukas, McGowan, Nace & Gutierrez, Chartered, do hereby certify that I have on this 8th day of April, 1993, sent by first-class United States mail, copies of the foregoing RESPONSE TO REPLY to the following:

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